

**CHALOS, O'CONNOR & DUFFY**  
ATTORNEYS AT LAW

Michael G. Chalos  
Eugene J. O'Connor  
George M. Chalos\*\*  
Owen F. Duffy  
Charles S. Cumming  
Leroy S. Corsa  
Timothy Semenoro\*  
Brian T. McCarthy  
George E. Murray  
Michael P. Siravo

\* Admitted in NJ  
\*\* Admitted in USDC-SD Tx

366 MAIN STREET  
PORT WASHINGTON, NEW YORK 11050-3120

TELEPHONE (516) 767-3600  
TELECOPIER (516) 767-3605 & 3925  
WEBSITE: WWW.CODUS-LAW.COM

George M. Chalos  
Partner  
gmc@codus-law.com

November 6, 2006

**VIA FEDERAL EXPRESS**

United States District Court - District of Delaware  
Clerk of the Court - Room 4209  
844 N. King Street  
Wilmington, DE 19801



Attn: Clerk of the Court

Re: United States of America v. Chian Spirit Maritime Enterprises, et al.  
Criminal No. 06-76 GMS

Dear Clerk of the Court:

We are counsel for defendants, Chian Spirit Maritime Enterprises, Inc. and Venetico Marine S/A, and write in connection with the above referenced criminal matter and further to our telecon with your good office earlier today. In this regard, we enclose the following Pre-Trial Motions for filing on behalf of the above mentioned Defendants:

1. Defendants' Motion for Reconsideration;
2. Defendants' Motion in Limine;
3. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Pascual Conge;
4. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Roberto Damasing;
5. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Bryan Espina;
6. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Edgar Villano;
7. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Mario Manzanilla; and

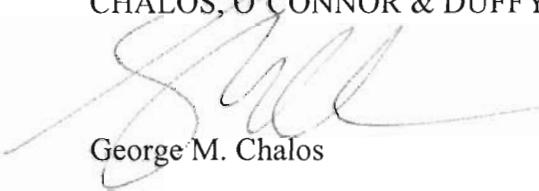
8. Defendants' Objections and Request for Pretrial Rulings as the Admissibility of the Following Portions of the Rule 15 Deposition Testimony of Paul Conge.

For your guidance, we provide herewith the original motions, plus one (1) copy. Additionally, we enclose an electronic copy of all the documents on the attached CD (in PDF format for electronic filing).

In advance, we thank you for your time and attention to this matter. Should you have any questions or comments, please feel free to contact the undersigned at anytime. In the meantime, and thanking you again for your assistance, we remain,

Respectfully yours,

CHALOS, O'CONNOR & DUFFY, LLP



George M. Chalos

GMC/gkk  
Enclosures

Cc: United States Department of Justice  
U.S. Attorney's Office  
1007 N. Orange Street, Suite 700  
Wilmington, Delaware 19801  
Attn: Edmond Falgowski, Esq.

United State Department of Justice  
Environmental Crimes Section  
P.O. Box 23985  
L'Enfant Plaza Street  
Washington, D.C. 20026  
Attn: Gregory Linsin, Esq.  
Jeffrey Phillips, Esq.  
Tracy Katz, Esq.